

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

CHRISTOPHER STUART CRITTENDEN,

Defendant.

Case No. 1:25-mj-231

CONSENT MOTION TO EXTEND TIME FOR INDICTMENT

The United States of America, by and through undersigned counsel, and with the consent of the defendant through his counsel, respectfully moves the Court to extend the time to indict this case through and including June 17, 2025. In support thereof, the government states as follows:

1. A complaint was filed in the Eastern District of Virginia on April 9, 2025, charging the defendant with interference with security screening personnel, in violation of Title 49, United States Code, Section 46503. After the defendant self-surrendered, he made his initial appearance in this District on April 17, 2025, and the Court released the defendant on his own recognizance subject to certain conditions.

2. The Speedy Trial Act requires that a defendant be indicted within thirty days of the defendant's arrest after subtracting all excludable time, including the time any pretrial motions are pending. 18 U.S.C. § 3161(h)(1)(D). The government's estimate of the current deadline to indict this case is May 17, 2025.

3. The government has already produced discovery to the defense. The parties seek additional time to explore a pre-indictment resolution and allow entry of a plea, while taking account of the schedule of the Court and the grand jury.

4. The United States, with the consent of the defendant, requests that the deadline to

indict this case be extended to June 17, 2025. Extending this deadline for the requested amount of time would be in the best interests of justice in that it would allow the defense the opportunity to review discovery, present any mitigating evidence, and negotiate a possible pre-indictment resolution.

5. The United States has advised counsel for the defendant of the filing of this motion, and the defendant has consented to its filing and the proposed extension.

WHEREFORE, the United States requests that the time to indict this case be extended to and including June 17, 2025, and that the delay resulting from this extension be excluded in computing the time within which an indictment must be filed pursuant to Title 18, United States Code, Section 3161(h). A proposed order is attached to this Motion.

Respectfully submitted,

Erik S. Siebert
United States Attorney

By: Meredith R. Clement
Meredith R. Clement
Special Assistant United States Attorney

Jack Morgan
Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that on May 8, 2025, I filed the foregoing with the Office of the Clerk of Court electronically using the CM/ECF system, which will automatically send a notification of such filing to all counsel of record.

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